

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JOHN DOE,

Plaintiff,

v.

Civil Action No. 21-cv-6761

ROCHESTER INSTITUTE OF TECHNOLOGY,

Defendant.

PROPOSED JOINT SCHEDULING PLAN

Pursuant to Federal Rules of Civil Procedure Rule 26(f) and Local Civil Rule of Procedure 16(b), Plaintiff John Doe, through his counsel of record, Nesenoff & Miltenberg, LLP, and Defendant Rochester Institute of Technology, through its counsel of record, Bond, Schoeneck & King, PLLC, have met and conferred about the discovery plan, and hereby propose the following:

- Deadlines – the Parties propose the following deadlines:
 - Request for ADR/settlement conference – May 16, 2022
 - Report on deposition hours – May 16, 2022
 - Joinder of parties/amendment of pleadings – May 30, 2022
 - Plaintiff's Rule 26(a)(2) disclosures – June 20, 2022
 - Defendant's Rule 26(a)(2) disclosures – July 18, 2022
 - Plaintiff's rebuttal Rule 26(a)(2) disclosures – August 8, 2022
 - Supplemental Rule 26(a)(2) disclosures – August 29, 2022
 - Discovery deadline – October 31, 2022

- Requests for admission – November 14, 2022
- Deadlines for disclosure of expert witnesses, if any – December 5, 2022
- Dispositive Pre-trial motion deadline – February 1, 2023
- Electronically Stored Information – counsel for Defendant Rochester Institute of Technology is familiar with and procured the electronic files RIT created, developed, and maintained, and able to produce same in a digital format if requested.
- Privileged or Trial Preparation Materials – the Parties agree to notify counsel immediately upon learning the opposing party or counsel for same inadvertently disclosed attorney-client privileged information and/or attorney work product.

Dated: May 3, 2022

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